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Robert Moser, MD, Secretary

Department of Health & Environment

Sam Brownback, Governor

February 16, 2015

Brenda B. Epperson  
Environmental Manager  
MRP Properties Company, LLC  
P.O. Box 696000  
San Antonio, TX 78269-6000

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FEB 18 2015  
AWMD/WRAP IO

**RE: Soil Investigation Work Plan  
MRP Properties Company, LLC  
1400 South M Street, Arkansas City, Kansas  
RCRA ID# KSD087418695**

Dear Ms. Epperson,

The Kansas Department of Health and Environment (KDHE) conducted a teleconference with the United States Environmental Protection Agency (EPA) Region 7, MRP Properties Companies, LLC (MRP), and MWH Americas, Inc. (MWH) on February 9, 2015 to discuss the status of various documents regarding human health and ecological risk assessment at the facility. The revised Soil Investigation Work Plan document, dated January 9, 2015, was discussed during the meeting which included human health and ecological risk assessors from EPA and MWH. The work plan details the scope of work necessary to adequately address soil and vapor intrusion data requirements for an assessment of human health and ecological risk at the facility. In the meeting KDHE requested MRP to modify Section 2.4 to state that soil samples would be collected from 12 locations for arsenic background sampling. MRP submitted the revised text on February 13, 2015 and KDHE approved the revisions.

In the KDHE/ EPA comment letter dated November 4, 2014, KDHE requested that MRP consider increasing the depth of soil sampling if visual sampling or elevated PID readings were encountered at the 8 -10 foot depth. MRP's response noted that the soil investigation was designed to evaluate human and ecological risk and that sampling data would be limited to 0 to 10 feet below ground surface (bgs) based on assumptions of risk to human and animal exposure in soil at depths of 10 feet bgs or less. KDHE acknowledges that the main purpose of this investigation is to obtain data for the baseline risk assessment. KDHE sees this as an opportunity to collect data to serve multiple purposes. Our comment was only meant as a suggestion of how MRP could utilize the planned borings to further delineate the extent and concentration of soil contamination that may impact the evaluation of groundwater in the Corrective Measures Study.

KDHE and EPA hereby approve the revised Soil Investigation Work Plan dated January 13, 2015. KDHE requests a hardcopy of the revision pages and a pdf file of the revised work plan, in its entirety, by March 9, 2015.

RCRA



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Ms. Brenda Epperson  
February 16, 2015  
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If you have any questions regarding this letter, please contact me by phone at (785)-291-3760 or e-mail at ([mvishnefske@kdheks.gov](mailto:mvishnefske@kdheks.gov)).

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Vishnefske".

Mark Vishnefske  
Environmental Scientist III  
Hazardous Waste Corrective Action and Geology Unit

cc: Jay Mednick – MWH  
Brad Roberts – EPA Region VII - AWMD/WRAP  
Allison Herring – DEA/SCDO/Waste Programs  
Bill Bider - BWM  
Mostafa Kamal – BWM (electronic)  
Jean Underwood – BWM (electronic)